

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

CHARLOTTE BRENT-BELL	)	
	)	
Plaintiff,	)	Case No. 17 C 1099
	)	
v.	)	Judge Gottschall
	)	Magistrate Judge Gilbert
THE CITY OF CHICAGO, et al.,	)	
	)	
Defendants	)	JURY TRIAL DEMANDED

**JOINT MOTION TO EXTEND DISCOVERY DEADLINES**

Plaintiff, Charlotte Brent-Bell, by her attorneys, and Defendants the City of Chicago, Joseph Struck, Pamela Childs-Laughlin, Sherry Kotlarz, Joseph Lopez, Cynthia Nicholas, Louis Boone, and Audie Manaois, by their attorneys, respectfully request that this Court grant them an 8-week extension of the discovery deadlines in this case, or until September 17, 2018 to complete fact discovery, stating in support as follows:

1. The parties in this case have continued to work diligently and cooperatively on discovery matters, but certain issues have arose that will make it difficult to complete fact discovery by the current deadline of July 17, 2018. Dkt. 76.

2. First, Plaintiff filed her Third Amended Complaint on April 19, 2018 and added Audie Manaois as a named Defendant. Dkt. 77. Counsel for the Individual Defendants entered an appearance for Defendant Manaois on June 20, 2018, *see* Dkt. 81, and Defendant Manaois has not yet filed an Answer to Plaintiff's Third Amended Complaint.

3. Plaintiff will timely serve written discovery requests on Defendant Manaois and will seek to take his deposition, but will need additional time past July 17 to complete this written and oral discovery.

4. In addition to the new discovery aimed at Defendant Manaois, there remain additional depositions that, due to unavoidable issues with scheduling, the parties will not be able to complete by the current discovery deadline. These depositions include those of the Plaintiff's damages witnesses, Plaintiff's treaters, and representatives of the City of Chicago who will be produced as 30(b)(6) deponents.

5. Last, Plaintiff and the City of Chicago have engaged in discussions pursuant to Local Rule 37.2 regarding the production of Complaint Register files requested in discovery by Plaintiff to support her *Monell* claim. The parties are still working through this issue, and it is likely that additional time will be needed to complete discovery into Plaintiff's *Monell* claims.

6. The discovery that remains to be completed in this case is necessary and not cumulative of issues already completed, and thus good cause exists to extend the discovery deadlines. *See* Fed. R. Evid. 26. No party will be prejudice by the extension and jointly agree to the relief sought in this motion.

WHEREFORE, the parties respectfully request that this Court grant them an 8-week extension of the discovery deadlines in this case, or until September 17, 2018 to complete fact discovery.

Dated: June 21, 2018

Respectfully Submitted,

/s/ Julie M. Goodwin  
*One of Plaintiff's Attorneys*

Arthur Loevy  
Jon Loevy  
Steven Art  
Julie Goodwin  
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**CERTIFICATE OF SERVICE**

I, Julie Goodwin, an attorney, hereby certify that I served the foregoing Joint Motion To Extend Discovery Deadlines on all counsel of record via the Court's CM / ECF filing system on June 21, 2018.

/s/ Julie M. Goodwin